

Hearing Date: April 24, 2025 at 10:00 a.m. (prevailing Eastern Time)
Objection Deadline: April 17, 2025 at 4:00 p.m. (prevailing Eastern Time)
Reply Deadline: April 21, 2025 at 4:00 p.m. (prevailing Eastern Time)

BARCLAY DAMON LLP

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Counsel to Debtors and Debtors-in-Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	Chapter 11
	:	
ST. CHRISTOPHERS, INC., <i>et al.</i> , ¹	:	Case No. 24-22373 (shl)
	:	Main Case
Debtors.	:	Jointly Administered

**NOTICE OF HEARING ON DEBTORS' MOTION FOR ENTRY OF ORDER
(I) APPROVING THE PRIVATE SALE OF THE NEW WINDSOR REAL
ESTATE BY DEBTOR THE MCQUADE FOUNDATION TO 621 BLOOMING
GROVE LLC UNDER THE PURCHASE AND SALE AGREEMENT FREE AND
CLEAR OF LIENS, CLAIMS, INTERESTS AND ENCUMBRANCES EXCEPT
FOR CERTAIN PERMITTED LIENS; (II) AUTHORIZING THE POTENTIAL
ASSUMPTION AND ASSIGNMENT OF THE GNC LEASE AND THE
REJECTION OF THE RESIDENTIAL LEASE IN CONNECTION
THEREWITH; AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on April 3, 2025, Barclay Damon LLP, as counsel for the
debtors and debtors-in-possession, filed the *Debtors' Motion for Entry of Order (I) Approving the
Private Sale of the New Windsor Real Estate by Debtor The McQuade Foundation to 621*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: St. Christopher's, Inc. (0485) and The McQuade Foundation (2652).

Blooming Grove LLC Under the Purchase and Sale Agreement Free and Clear of Liens, Claims, Interests, and Encumbrances Except for Certain Permitted Liens; (II) Authorizing the Potential Assumption and Assignment of the GNC Lease and the Rejection of the Residential Lease in Connection Therewith; and (III) Granting Related Relief (the “Motion”) pursuant to sections 105(a), 363, and 365 of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq., Rules 2002, 6004, 6006, and 9014 of the Federal Rules of Bankruptcy Procedure, and the Local Bankruptcy Rules for the Southern District of New York.

PLEASE TAKE FURTHER NOTICE that a hearing on the Motion will be held on **April 24, 2025 at 10:00 a.m. (prevailing Eastern Standard Time)** (the “Hearing”) before the Honorable Judge Sean H. Lane, United States Bankruptcy Judge, United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that participants can attend the Hearing in person or via the Zoom for Government platform. Participants in the Hearing are required to register their appearance before the hearing utilizing the e-Court Appearances tool at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>.

PLEASE TAKE FURTHER NOTICE that copies of the Motion may be obtained free of charge by contacting the undersigned counsel. You may also obtain copies of any pleadings by visiting the Bankruptcy Court’s website at <http://www.nysb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned thereafter from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or a later hearing.

PLEASE TAKE FURTHER NOTICE that any response or objection (together, the “Objections”) to the Motion shall be in writing, shall comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with General Order M-399 so as to be received by: the Bankruptcy Court, US Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004-1408; the Office of the United States Trustee, Alexander Hamilton Custom House, One Bowling Green, Room 534, New York, New York 10004-1408, Attn: Paul Schwartzberg, Esq., Paul.Schwartzberg@usdoj.gov; the Subchapter V Trustee, Heidi J. Sorvino, Esq., White and Williams LLP, 810 Seventh Avenue, Suite 500, New York, New York 10019, Sorvinoh@whiteandwilliams.com; and the undersigned counsel no later than **4:00 p.m. (prevailing Eastern Standard Time) on April 17, 2025**.

PLEASE TAKE FURTHER NOTICE that any objecting parties are required to attend the Hearing, and failure to appear may result in relief being granted upon default.

PLEASE TAKE FURTHER NOTICE that any replies in further support of or in opposition to (together, the “Replies”) to the Motion shall be in writing, shall comply with the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court by attorneys practicing in the Bankruptcy Court, including attorneys admitted *pro hac vice*, electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be

served in accordance with General Order M-399 so as to be received by: the Bankruptcy Court, US Bankruptcy Court, Southern District of New York, One Bowling Green, New York, New York 10004-1408; the Office of the United States Trustee, Alexander Hamilton Custom House, One Bowling Green, Room 534, New York, New York 10004-1408, Attn: Paul Schwartzberg, Esq., Paul.Schwartzberg@usdoj.gov; the Subchapter V Trustee, Heidi J. Sorvino, Esq., White and Williams LLP, 810 Seventh Avenue, Suite 500, New York, New York 10019, Sorvinoh@whiteandwilliams.com; and the undersigned counsel no later than **4:00 p.m. (prevailing Eastern Standard Time) on April 21, 2025.**

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served with respect to the Motion, the Debtors may, after the Hearing, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Motion, which order may be entered without further notice or opportunity to be heard.

Dated: April 3, 2025
New York, New York

BARCLAY DAMON LLP

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